

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA
CENTRAL DIVISION**

<p>IOWA PRIMATE LEARNING SANCTUARY d/b/a GREAT APE TRUST and APE COGNITION AND COMMUNICATION INSTITUTE,</p> <p>Plaintiffs,</p> <p>v.</p> <p>ZOOLOGICAL FOUNDATION OF GEORGIA, INC. d/b/a ZOO ATLANTA, DEMOCRATIC REPUBLIC OF CONGO, JAPAN MONKEY CENTRE INSTITUTE AND MUSEUM OF PRIMATOLOGY, SUE SAVAGE-RUMBAUGH, Ph.D., and BONOBO HOPE INITIATIVE, INC.</p> <p>Defendants.</p>	<p>Case No. 4:10-cv-00052 Hon. Magistrate Judge Ross Walters</p> <p>CLAIMANTS/DEFENDANTS' SUE SAVAGE RUMBAUGH AND BONOBO HOPE INITIATIVE'S EXHIBIT LIST</p>
--	--

COME NOW Claimants/Defendants' Sue Savage Rumbaugh and Bonobo Hope Initiative
and hereby provide their Exhibit List as follows:

Def. Ex. No.	Defendants Dr. Rumbaugh's and BHI's Exhibits	Bates Numbers	Objections [Cite Fed. R. Evid.]	Cat. A, B, C	Offered	Admitted/ Not Admitted (A)-(NA)
Ex. 1	Agreement for Settlement and Acknowledgment of Ownership, by and between the Iowa Primate Learning Sanctuary, Zoological Foundation of Georgia, Democratic Republic of the Congo, and Dr. Rumbaugh ("Settlement Agreement") (Last to sign on 2/17/13)	BHI 3007-11				

Ex. 2	Supplemental Agreement for Settlement and Acknowledgement of Ownership, by and between Iowa Primate Learning Sanctuary, Emily Sue Savage-Rumbaugh, and Bonobo Hope Initiative, Inc. ("Side Agreement") (Signed on 1/31/13)	BHI 3002-06				
Ex. 3	IPLS Board Minutes (10/24/06)	BHI 3832				
Ex. 4	IPLS Board Minutes (7/28/08)	BHI 3882-84				
Ex. 5	IPLS Board Minutes (10/6/08)	BHI 3891-92				
Ex. 6	IPLS Board Minutes (3/9/09)	BHI 3899-3900				
Ex. 7	IPLS Board Minutes (8/12/09)	BHI 3919-20				
Ex. 8	Overview and Structure of the Program of Research: Great Ape Trust of Iowa, by William Fields (8/12/09)	BHI 3926-32				
Ex. 9	IPLS Board Minutes (7/27/10)	BHI 3952-53				
Ex. 10	Letter from J. Ellen Gainor to Laurent Dubreuil (3/14/11)	BHI 5337				

Ex. 11	IPLS Board Minutes (8/1/11)	BHI 3954-56				
Ex. 12	D. Rumbaugh and L. Simpson (12/26/11)	BHI 4929-37				
Ex. 13	K. Schweller e-mail to Bonobo Hope (2/2/12)	BHI 5268-70				
Ex. 14	BHI Bylaws (7/20/12)	BHI 1764-74				
Ex. 15	Email chain, last email from L. Simpson (10/3/12)	BHI 4938-43				
Ex. 16	K. Schweller email transmitting GATI Board meeting minutes (10/20/12)	BHI 4944-55				
Ex. 17	Email from Dr. Rumbaugh attaching research proposal (11/1/12)	BHI 3599-3637				
Ex. 18	Email chain, last email from Dr. Rumbaugh (11/4/12)	BHI 4956-66				
Ex. 19	Email from L. Simpson to Bonobo Hope addressees (11/26/12)	BHI 4977-86				
Ex. 20	Email chain, last email from Ursula Goodenough (11/27/12)	BHI 4969-76				
Ex. 21	K. Schweller emails to Bonobo Hope (11/27/12)	BHI 4977-86				

Ex. 22	Email from L. Simpson (12/4/12)	BHI 4998				
Ex. 23	Memorandum from L. Simpson (12/4/12); Followed by minutes of IPLS Board meeting (12/12/12)	L. Simpson Dep. Ex. 11				
Ex. 24	Email chain, last email from Dr. Rumbaugh (12/4/12)	BHI 4996-97				
Ex. 25	Letter from L. Simpson (2/4/13)	BHI 5090-93				
Ex. 26	Email from C. Mate (4/25/13)	BHI 59-61				
Ex. 27	IPLS Board Minutes (5/22/13)	BHI 3994-95				
Ex. 28	Email from L. Simpson (6/4/13)	BHI 5116-17				
Ex. 29	Emails L. Simpson to boards (7/1/13)	BHI 5373-81				
Ex. 30	Email from L. Simpson	BHI 976-77				
Ex. 31	IPLS Form 990 for 2012 (7/15/13)	BHI 5727-46				
Ex. 32	Email from G. Caudill (7/30/13)	L. Simpson Dep. Ex. 14				

Ex. 33	IPLS Board meeting agenda (7/31/13)	BHI 5122-23				
Ex. 34	Certificate of Administrative Dissolution (8/14/13) (eff. 8/9/13)	L. Simpson Dep. Ex. 15				
Ex. 35	Emails with G. Caudill and Dr. Rumbaugh (8/30/13)	BHI 5680-83				
Ex. 36	Email from L. Simpson to IPLS Board (9/24/13)	BHI 5778-79				
Ex. 37	Email from L. Simpson (9/27/13)					
Ex. 38	Yerkes request for "guarantee"	L. Simpson Dep. Ex. 32				
Ex. 39	IPLS Application for Reinstatement (11/7/13)	BHI 3969				
Ex. 40	Email from Dr. Rumbaugh (11/9/13)	BHI 5321-22				
Ex. 41	Email from G. Caudill (11/9/13)					
Ex. 42	Email from G. Caudill (11/10/13)	L. Simpson Dep. Ex. 26				
Ex. 43	Email from G. Caudill (11/9/13)	BHI 4826				

Ex. 44	[OMITTED]					
Ex. 45	Email from Gaila Conklin (11/12/13)	BHI 1610				
Ex. 46	Email from L. Simpson (11/12/13)	L. Simpson Dep. Ex. 28				
Ex. 47	Letter from Iowa Workforce Development (11/14/13)	BHI 2938				
Ex. 48	D. Rumbaugh email forwarding G. Caudill memo to staff (11/20/13)	L. Simpson Dep. Ex. 30				
Ex. 49	Email chain, last email from B. Greaves (11/28/13)	BHI 4524-29				
Ex. 50	Email from L. Simpson (12/11/13)	L. Simpson Dep. Ex. 45				
Ex. 51	Email chain, last email from L. Simpson (12/12/13)	BHI 4465-69				
Ex. 52	Email from Dr. Rumbaugh (12/12/13)	BHI 4472				
Ex. 53	Email from Dr. Rumbaugh (12/17/13)	BHI 4447				
Ex. 54	IPLS board meeting minutes (12/18/13)	ACCI 25-27				

Ex. 55	IPLS board meeting minutes (12/18/13)	BHI 2947-51				
Ex. 56	Bill of Sale (12/18/13)	Jared Dep. Ex. 4				
Ex. 57	ACCI Articles of Incorporation (12/18/13)	Ex. F to Motion For Specific Performance and Related Relief [Dkt. 69-2]				
Ex. 58	ACCI board meeting minutes (12/18/13)	ACCI 28-36				
Ex. 59	Email from L. Simpson (12/18/13)	L. Simpson Dep. Ex. 40				
Ex. 60	Email chain, last email from W. Zifchak (12/18/13)	Ex. G to Motion For Specific Performance and Related Relief [Dkt. 69-2]				
Ex. 61	Email from G. Caudill (12/19/13)					
Ex. 62	Email chain, last email from Dr. Rumbaugh (1/28/14)	BHI 4179-95				
Ex. 63	IPLS Press Release (1/28/14)	BHI 3020-21				
Ex. 64	Email chain, last email from J. Taglialatela (1/29/14)	BHI 4405-16				

Ex. 65	Letter from W. Zifchak (2/10/14)	Ex. H to Motion For Specific Performance and Related Relief [Dkt. 69-2]				
Ex. 66	Letter from W. Zifchak (2/10/14)	BHI 4116-17				
Ex. 67	Email chain, last email from L. Simpson (2/18/14)	BHI 3577-81				
Ex. 68	Email chain, last email from L. Simpson (3/12/14)	BHI 3548-53				
Ex. 69	Email chain, last email from L. Simpson (3/18/14)	BHI 3515-27				
Ex. 70	Email chain, last email from S. Boers (3/18/14)	BHI 3498- 3514				
Ex. 71	Email chain, last email from J. Tagliatela (3/18/14)	BHI 3490-97				
Ex. 72	Email chain, last email from J. Tagliatela (03/24/14)	Jared Dep. Ex. 7				
Ex. 73	Email chain, last email from L. Simpson (4/15/14)	BHI 3431-40				
Ex. 74	Email chain, last email from S. Knoploh-Odole (4/22/14)	BHI 3316-26				

Ex. 75	Email chain, last email from L. Simpson (4/25/14)	BHI 3283-86				
Ex. 76	Email chain, last email from L. Simpson (4/28/14)	BHI 3270-78				
Ex. 77	Email chain, last email from S. Knoploh-Odole (5/7/14)	BHI 3180-87				
Ex. 78	IPLS Form 990 for 2013 (5/14/14)	BHI 5747-05769				
Ex. 79	Email chain, last email from G. Caudill (6/22/14)					
Ex. 80	Email chain, last email from Dr. Rumbaugh (6/23/14)	BHI 3131-32				
Ex. 81	Email chain, last email from Dr. Rumbaugh (6/23/14)	BHI 3127-30				
Ex. 82	ACCI Board Minutes 2014 (7/25/14)	ACCI 41-42				
Ex. 83	[OMITTED]					
Ex. 84	Email from Dr. Rumbaugh (8/20/14)	BHI 4830-31				
Ex. 85	BHI Board Minutes (9/5/14)	BHI 4875-77				

Ex. 86	Email from Duane Rumbaugh (11/19/14)	BHI 3046-47				
Ex. 87	Email from Dr. Rumbaugh (12/14/14)	BHI 3039-41				
Ex. 88	[OMITTED]					
Ex. 89	BHI Board minutes (2/8/15)	BHI 5806-07				
Ex. 90	Emails exchanged between J. Taglialatela and BHI board members re: requests for information and visitation					
Ex. 91	Letter from B. Zifchak and attachments to L. Simpson re: US Army Corps of Engineers assessment of the Des Moines Campus and the ARUP flood condition opinion (04/27/15)	BHI 4839-74; BHI 4903-08; BHI 4915-16				
Ex. 92	Aihua Tang, Floodplain Manager Certificate	BHI 4878				
Ex. 93	Letter from S. Knowploh-Odoile to J. Taglialatela (5/12/15)	BHI 5726				
Ex. 94	Standby Letter of Credit from Ryan Sheldon for Missouri facility operation					
Ex. 95	Prof. Laurent Dubreuil CV	BHI 5660-71				

Ex. 96	Dr. Rumbaugh CV	BHI 5685-5725				
Ex. 97	Prof. Russ Tuttle CV (5/6/15)	BHI 5637-59				
Ex. 98	SSR video compilation of bonobos in research settings	BHI 5770-77				
Ex. 99	L. Simpson to C. Mate (11/12/13)	BHI 47-65				
Ex. 100	Dr. Rumbaugh to L. Simpson (11/13/13)	BHI 1632				
Ex. 101	Dr. Rumbaugh to L. Simpson (11/13/13)	BHI 1633				
Ex. 102	L. Simpson to Dr. Rumbaugh (11/13/13)	BHI 1637-39				
Ex. 103	G. Caudill to Dr. Rumbaugh (11/9/13)	BHI 5780-81				

DATED: May 13, 2015

FAEGRE BAKER DANIELS LLP

/s/ Todd Langel

Todd P. Langel

801 Grand Avenue, 33rd Floor

Des Moines, IA 50309-8011

Tel: 515-248-9000

Fax: 515-248-9010

todd.langel@faegrebd.com

KAYE SCHOLER LLP

William C. Zifchak*
250 West 55th Street
New York, NY 10019-9710
Tel: 212-836-8743
Fax: 212-836-6743
Cell: 347-525-5143
wzifchak@kayescholer.com
**admitted pro hac vice*

Joshua Stambaugh*
1999 Avenue of the Stars, Suite 1600
Los Angeles, California 90067
Tel: 310-788-1244
Fax: 310-229-1844
Joshua.Stambaugh@kayescholer.com
**admitted pro hac vice*

Ross Neihaus*
Three First National Plaza
70 West Madison Street, Suite 4200
Chicago, Illinois 60602
Tel: 312-583-2458
Fax: 312-583-2558
ross.neihaus@kayescholer.com
**admitted pro hac vice*

ATTORNEYS FOR DR. SUE SAVAGE-
RUMBAUGH, PH.D. and BONOBO
HOPE INITIATIVE, INC.

Certificate of Service

The undersigned hereby certifies that a true copy of Defendants Dr. Sue Savage-Rumbaugh's and Bonobo Hope Initiative's Exhibit List was served upon the following parties through the ECF filing system on the 13th day of May, 2015.

Paul D. Burns
Bradley & Riley PC
Tower Place
One South Gilbert
Iowa City, IA 52240-3914

William W. Graham
Graham Ervanian & Cacciatore, LLP
317 Sixth Avenue
Suite 900
Des Moines, IA 50309

Jack Pennington
Simpson, Jensen, Abels, Fischer &
Bouslog, P.C.
604 Locust Street, Ste. 222
Des Moines, Iowa 50309

Gregory M. Lederer
Kimberly K. Hardeman
Lederer Weston Craig, PLC
118 Third Avenue SE, Suite 700
P.O. Box 1927
Cedar Rapids, IA 52406-1927

William J. Miller
Dorsey & Whitney
801 Grand Avenue, Suite 4100
Des Moines, IA 50309

/s/ Todd Langel